

FISHMAN MCINTYRE LEVINE SAMANSKY P.C.

STANLEY P. FISHMAN*
CHRISTOPHER E. MCINTYRE > +
MITCHELL B. LEVINE*
SCOTT D. SAMANSKY**
CASSANDRA A. WILLOCK*
SCOTT A. GROSSMAN <
PETER J. MURANO, III*
KEVIN J. DONNELLY *
ANN MARIE F. KANE*
MARK N. KEDDIS*
CAROLINE PAPADATOS <

NEW YORK OFFICE
521 FIFTH AVENUE, 17th FL.
NEW YORK, NY 10175
Tel (212) 461-7190
Fax (973) 560-0060
*(Mail and Overnight Deliveries
to New Jersey office)*

120 EAGLE ROCK AVENUE
EAST HANOVER, NJ 07936
Telephone (973) 560-9000
Fax (973) 560-0060
+ NJ BAR
+ NY BAR
+ NJ, NY & CT BARS
**NJ & DC BARS
* NJ & NY BARS

September 19, 2023

+ Certified by the Supreme Court
of NJ as a Civil Trial Attorney

www.fishmanmcintyre.com

Via ECF

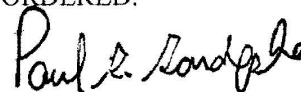
Hon. Paul G. Gardephe, U.S.D.J.
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Re: Joseph Mueller v. Target Corporation, et al.
Case No.: 1:23-cv-02972 (PGG)
Our File No.: TARN-206

MEMO ENDORSED:

Any third-party complaint will be filed by
October 10, 2023.

SO ORDERED.



Paul G. Gardephe
United States District Judge

Dear Judge Gardephe:

Dated: September 27, 2023

This office represents defendants, Target Corporation and Target Brands, Inc., ("Target") in connection with the above matter. Please accept this letter on behalf of Target seeking an extension of time of the deadline in which to file a third-party action/amend the pleadings. The present deadline is September 25, 2023; which was approximately 30 days from the initial conference held on August 24, 2023. By this application, Target is seeking a 15 day extension of the deadline; to October 10, 2023.

This is the first request for an extension of any discovery deadline. Plaintiff's counsel consents to the same.

My office has been working diligently with the entity which may be a potential third-party defendant in this action. However, we have not come to a resolution regarding that. If no resolution can be agreed to, Target intends to file a third-party action. Further, I will be out of my office for much of next week.

Target does not believe this modest extension will have any impact on existing discovery end dates.

Should Your Honor be inclined to grant this request, we will be happy to provide the court with an amended case management plan and scheduling order.

Thank you very much for Your Honor's attention.

Respectfully submitted,

/s/Mitchell B. Levine

Mitchell B. Levine
mitch@fishmanmcintyre.com

MBL:baz

cc: Laura Gentile, Esq. - Laura@gentilelaw.com